DEPARTMENT OF TRANSPORTATION

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August 1, 2014

Ms. Connie Chung, AICP Supervising Regional Planner Department of Regional Planning County of Los Angeles 320 West Temple Street, Room 1356 Los Angeles, CA 90012

RE: Los Angeles County General Plan Update

Vic. LA Countywide SCH #: 2011081042

IGR/CEQA No. 140649AL-DEIR

Ref. IGR/CEQA No.131018AL Revision Ref. IGR/CEQA No.130635AL-Re-NOP Ref. IGR/CEQA No.120521AL-Draft GP

Ref. IGR/CEQA No.110830-NOP

Dear: Ms. Chung:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project is a comprehensive update of the Los Angeles County General Plan and associated actions. The project includes goals, policies, implementation programs and ordinances. The project covers the unincorporated areas and accommodates new housing and employment opportunities in anticipation of population growth. The General Plan Update focuses growth in the unincorporated areas with access to services and infrastructure and reduces the potential for growth in environmentally sensitive and hazardous area. The project will replace the adopted General Plan.

In the interest of mutual cooperation throughout the environmental review of the Los Angeles County General Plan Update EIR, Caltrans provides following comments. On Table 1-2 (Page 1-12 of the DEIR), Proposed Project Buildout Projection (by Planning Area), there are a total of 11 planning areas. They are as follows:

- 1. Antelope Valley Planning Area
- 2. Coastal Islands Planning Area
- 3. East San Gabriel Valley Planning Area
- 4. Gateway Planning Area
- 5. Metro Planning Area
- 6. San Fernando Valley Planning Area

Ms. Connie Chung, AICP August 1, 2014 Page 2

- 7. Santa Clarita Valley Planning Area
- 8. Santa Monica Mountains Planning Area
- 9. South Bay Planning Area
- 10. West San Gabriel Valley Planning Area
- 11. Westside Planning Area

As shown above planning areas, buildout of the Proposed Project would result in 358,930 additional residential dwelling units compared to existing land uses. Buildout of the Proposed Project would result in an 86 percent increase in commercial uses and a 40 percent increase in industrial uses. Generally in urban areas, the existing freeways such as US-101, I-405, I-10 and SR-60 are operating at Level of Service (LOS) E or F during the peak hours. In rural areas, the freeway/highway such as SR-14 and SR-138 may be still operating at an acceptable LOS during the peak hours. When the project is at buildout, many freeway segments will be significantly impacted. However, this project is a program document with no proposed specific project. Caltrans will continue to work with the County Public Work in identifying potential traffic mitigation when a specific project is identified that may contribute project direct/cumulative impact to State Highway System (SHS).

Caltrans suggests that the County consider revising section 5.16.8 Mitigation Measures (Page 5.16-81 of DEIR) to include the following:

- T-3 This fair share program also includes the State Highway System.
- T-3.1 Before the CMP fee program is adopted by Metro and County of Los Angeles, any identified project that will contribute cumulative traffic impact on the State Highway System will participate in a local fair-share program adopted by the County that is supported by Caltrans.
- T-5 The County shall require traffic engineering firms retained to prepare traffic impact studies for future development projects to consult with Caltrans, when a development proposal meets the requirements of statewide, regional, or areawide significance per CEQA Guidelines §15206(b). When preparing traffic impact studies, the most up to date Guide for the Preparation of Traffic Impact Studies from Caltrans shall be followed. Proposed developments meeting the criteria of statewide, regional or areawide significance include:
- Proposed residential developments of more than 500 dwelling units.
- Proposed shopping centers or business establishments employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space.
- Proposed commercial office buildings employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space.
- Proposed hotel/motel developments of more than 500 rooms.

When the CEQA criteria of regional significance are not met, Caltrans recommends transportation engineers and/or Lead Agency representatives consult

Ms. Connie Chung, AICP August 1, 2014 Page 3

with Caltrans when a proposed development includes the following characteristics:

- All proposed developments that have the potential to cause a significant impact to state facilities (right-of-way, intersections, interchanges, etc.) and when required mitigation improvements are proposed in the initial study. Mitigation concurrence should be obtained from Caltrans as early as possible.
- Any development that assigns 50 or more trips (passenger car equivalent trips) during peak hours to a state highway/freeway.
- Any development that assigns 10 or more trips (passenger car equivalent trips) during peak hours to an off-ramp. On/off-Ramps that are very close to each other in which the project trips may cause congestion on the left turn lane storage to the on-ramp.
- Any development located adjacent to a State facility and may require a Caltrans Encroachment Permit.
- Any development will potentially cause safety concerns on the State facilities.
- When the County cannot determine whether or not Caltrans will expect a traffic impact analysis pursuant to CEQA.

In the General Plan, Caltrans suggests a policy to be reflected pursuant to the adopted State legislation (SB743) that may significantly alter the means in which traffic impact studies are prepared.

We look forward in working with the County staff. If you have any questions, please feel free to contact Mr. Alan Lin, Caltrans project coordinator, at (213) 897-8391 and refer to IGR/CEQA No. 140649AL

Sincerely,

DIANNA WATSON

Branch Chief

Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse